



KPU Telecommunications

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December 8, 2016

Ms. Marlene Dortch, Secretary
Federal Communications Commission
445 12th Street, SW
Washington D.C. 20554

RE: Ex parte filing in WC Dockets No. 10-90 and 16-271

Dear Ms. Dortch:

The purpose of this communication is for KPU Telecommunications (KPU) to provide an update to its performance obligations related to its election of the Alaska Plan.

The previous KPU performance obligations included vacant lots in the number of locations passed. Since that time and in consideration of the public notice DA 16-1363 released today, December 8th 2016, and discussions with FCC staff, we understand that vacant lots should not be included in the number of locations passed.

Additionally, KPU reduced the number of locations passed so that we do not include the "...larger businesses that purchase dedicated high-capacity transmission services, such as business data services...", "group quarters" and "community anchor institutions" as discussed in DA 16-1363.

Finally, KPU has reduced the number of locations in consideration of a percentage of Census Nonemployer Establishments that we estimate would be at the same location as a residential Census Housing Unit. These locations would not have unique latitude/longitude coordinates as discussed in DA 16-1363.

If you have any questions, please call me at 907-228-5439.

Sincerely,

A handwritten signature in blue ink, appearing to read 'DLindgren', written over a horizontal line.

Daniel B. Lindgren
Assistant KPU Telecommunications Division Manager

Attachment" KPU Revised Performance Obligations

Cc: Alex Minard
Jesse Jachman
Christine O'Connor, ATA

Alaska Infrastructure Fund Performance Obligations
Ketchikan Public Utilities - Telecommunications Division

Note 1

Note 2

		Locations Passed 12/31/2015	% at Benchmark 12/31/2015	Number of Locations at Benchmark 12/31/15	% at Benchmark Year 5	Number of Locations at Benchmark Year 5	% at Benchmark Year 10	Number of Locations at Benchmark Year 10
Middle Mile Facility								
Satellite	1Mb/256k							
Hybrid Microwave-Fiber	4Mb/1Mb							
Fiber	10Mb/1Mb	7,174	7%	502	4%	287	1%	72
Fiber	25Mb/3Mb	7,174	5%	359	6%	430	4%	287
Fiber	50Mb/5Mb	7,174	6%	430	7%	502	9%	646
Fiber	100Mb/5Mb	7,174	72%	5,165	79%	5,667	85%	6,098

Note 1: Residential Speeds

Note 2: Locations passed in ETC's network as of 12/31/15.

Note 3: Year 1 is 2017

While KPU has significant investment in fiber to the curb, the majority of locations are served with copper to the premise and will need to be upgraded at significant cost. Over the term of the Alaska Infrastructure Fund, KPU will install fiber to the premise to support increased bandwidth needs for our customers.

Base Locations include Census Housing Units, Census Private Nonfarm Establishments, non home based Census Nonemployer Establishments